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Tuesday, February 25, 2020

VIA CM/ECF

Hon. Elizabeth Stong
United States Bankruptcy Court
Eastern District of New York
271 Cadman Plaza East
Brooklyn, NY 11201

Re: *In Re. Septina Noel-Jones*
Case No. 18-46001-ESS
Loss Mitigation Status Report and Request for Continuation of Loss Mitigation
Re. 329 Pulaski Street, Brooklyn, NY 11206

Dear Judge Stong:

This office represents the Debtor, Septina Noel-Jones, in the above-referenced matter. Please allow this letter to serve as a status update on loss mitigation.

On or about January 14, 2020, I upgraded my office operating system and it resulted in major technical difficulties. Several issues developed including, but not limited to, inability or limited ability to scan, print, use email, open documents. I notified Creditor's counsel of the issue, however, I had expected it to be rectified sooner. Unfortunately, I encountered further difficulty obtaining after-hours access to the office building for our IT servicer.

Once the problem was fixed, I had missed numerous deadlines. Unfortunately, during the first two weeks of February, I was forced to take family leave as a result of three deaths in my family. Documents will submitted to Creditor's counsel no later than Friday.

In light of the foregoing, I respectfully request an adjournment of loss mitigation as the Debtor should not be penalized for the reasonable delay suffered as a result of law office error.

With regards,

/s/

Jjaais A. Forde, Esq.

Cc. Nicole DiStasio, Attorney for Wells Fargo Bank, NA via CM/ECF
Katherine Heidbrink, Attorney for Wells Fargo Bank, NA via CM/ECF
Marianne DeRosa, Chapter 13 Trustee via CM/ECF